



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 19-166

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated December 2014.]

2. Form, Style and Placement in Administrative Code

a. In s. MPSW 20.02 (10) (c), the semicolon that exists in the current rule should be shown with a strike-through before the inserted, underscored language. Additionally, for the sake of clarity and in accordance with current drafting conventions, the board should consider amending s. MPSW 20.02 (10) (intro.) and its subunits. Currently, each subunit in the list ends with a semicolon, and there are two uses of “or”, in both pars. (b) and (e), which may be confusing for a reader. Consider revising the introductory statement to insert the word “any”, and revising each of the subunits to end with a period rather than a semicolon and to remove both instances of the word “or”. [s. 1.03 (4), Manual.]

b. SECTIONS 7 and 8 of the proposed rule could be combined into one SECTION. When two or more subsections of a rule provision are affected by the same treatment, they may be included in the same SECTION, so long as any intervening subunits are unaffected. [s. 1.04 (2) (a) 4., Manual.] The subsequent SECTIONS of the proposed rule should be renumbered accordingly.

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. In the board’s analysis for the proposed rule, the spacing in the first paragraph describing the corresponding Iowa rules should be fixed for the extra space before the comma in the sixth line, and the missing space after the comma.

b. In the board's analysis for the proposed rule, the descriptions for the analysis and supporting documents, fiscal estimate, and effect on small business should each be revised from the future or present tense to past tense.